

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

FRANKLIN,

Plaintiff,

v.

WORMUTH,

Defendant.

Case No. 8:23-cv-02129-PX

**MOTION FOR EXTENSION OF TIME TO FILE RENEWED MOTION FOR
SUMMARY JUDGMENT**

Defendant, by and through undersigned counsel, moves the Court to extend Defendant's deadline to file a Renewed Motion for Summary Judgment by seven days through and including August 8, 2024. In support of this request, Defendant states as follows:

1. On July 11, 2024, the Court granted in part and denied in part Defendant's Motion for Summary Judgment. *See* ECF Nos. 34-35. The Court denied Defendant's motion with respect to Request No. 2 of Plaintiff's FOIA request, noting that Defendant did not provide the Court with enough factual information to allow the Court to assess the adequacy of Defendant's search. ECF No. 34 at 9.

2. The Court granted Defendant twenty-one days to file a renewed and supplemental motion for summary judgment. *See* ECF No. 35. Defendant's renewed and supplemental motion for summary judgment is due August 1, 2024.

3. Defendant is in the process of obtaining supplemental declarations and preparing the renewed motion. Defendant requests a short extension of seven days through and including August 8, 2024 to complete this process.

4. In light of Plaintiff's *pro se* status, the undersigned has not conferred with Plaintiff concerning this motion, however, Defendant does not anticipate any prejudice to Plaintiff from the short extension of time requested herein.

WHEREFORE, Defendant respectfully requests the Court extend Defendant's deadline to file a renewed and supplemental motion for summary judgment through and including August 8, 2024.

Respectfully submitted,

Erek L. Barron
United States Attorney

/s/

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on August 1, 2024, I caused a copy of the foregoing *Motion for Extension of Time* to be served via the Court's CM/ECF system on all parties receiving electronic notices in this case.

/s/

Rebecca Koch
Assistant United States Attorney